



PCU038799

Lorraine Yudaeff
12 Nagle Close
Fern Bay 2295



Mr Nick Hall

Dear Mr Hall,

Objection to Incitec Pivot – SSD-4986

I have attached my objection to this project, and the reasons for it.

My email address is: laramel@fernbay.com if this is the easiest way to confirm receipt.

Yours sincerely,

October 9, 2012

OBJECTION TO INCITEC PIVOT, KOORAGANG ISLAND

Project Application : SSD – 4986

I object to Incitec Pivot's proposal for an ammonium nitrate (AN) plant on Kooragang Island for the following reasons:

Pollution Effects on Aged & Disabled People

. Two very vulnerable communities at Wescott (aged) and Stockton Centre (developmentally disabled) live within the fall-out zone of this development's increased AN particles from its Prill tower; toxic nitrous oxides, particularly nitrogen dioxide; and toxic ammonia emissions. These products can lead to health problems ranging from respiratory distress to death in people with heart or lung disease. Given the already substantial health risks of Orica's fallout, as well as coal and other dust from the Island, these additional challenges represent a lethal cocktail to a population whose health status is already severely compromised.

Inappropriate Site/Unacceptable Risk:

. To suggest locating a plant that will manufacture explosive grade AN next to Orica, resulting in a stockpile of up to 21,500 tonnes of AN, while neglecting to mention that stockpile is in close proximity of the additional risk factors of 50-100,000 litres of ethanol, a gas export facility & coal mountains, makes a joke of due diligence and a mockery of the precautionary principle.

. When that stockpile, & additional risk factors, are to be sited less than 1 kilometre from densely populated areas, we are in the realm of a world first. South Australia has refused approval for a housing development at Port Adelaide because of the risk of its proposed proximity to storage of 2500 tonnes of AN.

. Major disasters have occurred, some with fertiliser (not explosive) grade AN, & with nothing like the tonnage proposed for Kooragang. For example, 200-300 tons in a fertiliser factory in Toulouse, 2001, killed 31 people & injured 2442, while damaging 30,000 buildings up to 3 kilometres away.

. None of the accidents to date involved the perfect oxygen balance, involving tens of thousands of fuel oil, that Incitec assures would be required to make a blast.

. The onsite prilling that Incitec Pivot proposes would increase the oxygen supply, thereby increasing the power of a blast.

. The much vaunted stability of AN would be negated by such incidents as an electrical fault, fire, sea flare, some contaminants & earthquake.

. The safety records of Incitec & Orica do not inspire anything approaching confidence in regard to the possibility of most of such destabilising incidents.

. A 5.6 Richter magnitude earthquake rocked Newcastle & the suburbs surrounding the proposed development in 1989; while quake activity has been noted in the area since white settlement at least.

. The risk of explosion, as evidenced by accidents to date, is significantly increased by the proposed transporting of AN by road & sea.

. A major risk is when fire enters stored AN. Emergency Response Guidelines dictate that such a fire should not be fought, with evacuation as the only correct response.

Lack of an Emergency Response Plan:

. Given the accumulation of risk factors, the very least surrounding communities should expect is an agreed Emergency Response Plan that guarantees safety for all concerned.

. If Incitec Pivot has such a plan, it is refusing to inform the surrounding communities about it.

. When the company cites security fears related to terrorism as the basis for its refusal to better inform surrounding communities, the sanity of the siting of this operation must be called into question.

. In the event of fire in the product, Stockton, the most at risk community with its one road as the only means of egress, would be impossible to evacuate in anything like the required time in even a minor event.

. The most vulnerable people living at Wescott & Stockton Centre would be impossible to evacuate under any circumstances.

. In the worst scenario, which must be addressed in any proper evaluation of risk, since the velocity of ammonium nitrate fuel oil is at least 3 kms/second, evacuation is a moot point.